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Harris H. Bass
Vice President
General Manager

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July 15, 1996

Reed E. Hundt, Chairman
Federal Communications Commission
1919 M. Street, NW - Room 814
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re. Interconnection, CC Docket No. 96-98

Dear Chairman Hundt:

Thank you for the opportunity for Jim Voelker of Nextlink, William Glasgow and myself of Prime Cable to meet with you on May 29, 1996 in Washington DC. This letter is a follow up to our discussions.

As the debate has ranged between the FCC and Capitol Hill over the past weeks, it has become ever more apparent to us that it is essential for the FCC to set detailed national standards on interconnection issues. Lack of uniformity of approach will significantly add to the costs for competitors to move among different jurisdictions. Moreover, we cannot effectively fight for competition on many fronts at one time.

Attached are several proposed rules setting forth the obligations of local exchange companies under Section 251 (a) of the 96 act. These rules address three areas that we believe are among the most important for competition to be successful.

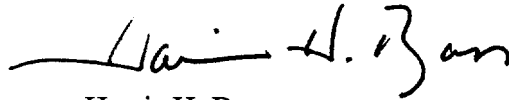
- They include a specific deadline for implementation of a permanent solution to the number portability issue, and provide financial incentives for carriers to meet the deadline;
- They impose reporting requirements to aid the Commission in determining technical parity for network interconnection; and
- They provide for an expedited complaint process.

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Please let me know if you or your staff have any questions about our proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Harris H. Bass". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a large, stylized "B" at the end.

Harris H. Bass
Vice President and General Manager

cc: James Voelker
William Glasgow

DRAFT

NEXTLINK PROPOSED RULES

PART **

IMPLEMENTATION OF LOCAL COMPETITION

Subpart B - Duties Under Section 251(a)

****310 Service Provider Number Portability -- §§ 198-201**

(a) A local exchange carrier shall provide local telephone number portability on a reciprocal basis between its network and the network of all other local exchange carriers offering service to end users.

(b) Beginning no later than March 31, 1997, all local exchange carriers shall begin implementing permanent local telephone number portability without interruption of service to their end users according to any method meeting the following criteria:

- (1) Compatibility with database solutions;
- (2) IN or AXN feature triggering;
- (3) Preservation of full feature interactions,
including all SS-7 based functionalities;
- (4) Efficient allocation of access revenues;
- (5) Provisions for ten digit routing; and
- (6) N-1 call processing scenario.

Such implementation shall be completed by December 31, 1997. If the local exchange carrier has not completed such implementation by December 31, 1997, that carrier shall provide interim local telephone number portability pursuant to subsection (c) after

that date without charge. Each local exchange carrier shall provide permanent local telephone number portability arrangements to other local exchange carriers at no charge, except for any cost-based processing charges associated with authorized collect, calling card, and third-number billed calls billed to retained numbers.

(c) Prior to the implementation of permanent local telephone number portability, all local exchange carriers shall offer interim local telephone number portability as follows:

(1) Upon receipt of a signed letter of agency from an end user and an associated service order requesting the assignment of the telephone number to another local exchange carrier (the "receiving carrier"), a local exchange carrier shall promptly forward all calls to the end user's telephone number to the telephone number designated by the receiving carrier. The receiving carrier shall implement such requests in the same time frame and under the same quality standards as it treats its own operations.

(2) A local exchange carrier that has received such request (the "forwarding carrier") shall route forwarded traffic to a receiving carrier in a manner that does not degrade the quality or functionality of the call and that minimizes any delay in call set-up.

(3) The receiving carrier shall become the customer of record for the forwarding carrier's forwarded telephone numbers. A forwarding carrier shall provide the receiving

carrier with a single consolidated billing statement for all collect, calling card, and third-number billed calls associated with those numbers, with sub-account detail by retained number. Such billing statement shall be delivered either by electronic data transfer, daily magnetic tape, or monthly magnetic tape, as the receiving carrier requires.

(4) As directed by the receiving carrier, the forwarding carrier shall update its Line Information Database listings for retained numbers, and restrict or cancel calling cards, associated with the forwarded numbers.

(5) Within two business days after receiving notification from an end user, the receiving carrier shall notify a forwarding carrier of the end user's termination of service and of the end user's instructions regarding telephone numbers. The forwarding carrier shall, pursuant to the end user's instructions, reinstate service to that end user, cancel the interim local telephone number portability arrangements for that end user's telephone numbers, or redirect the interim local telephone number portability to another receiving local exchange carrier.

(6) The forwarding carrier shall give to the receiving carrier any access charges received from any interexchange carrier for calls routed to the receiving carrier's end user.

(d) Cost recovery

(1) A telecommunications carrier shall bear its own internal costs of implementing permanent local telephone number portability, and may not recover those via a specific end user rate element identified solely for recovery of such costs.

(2) Third party services required for implementation of permanent local telephone number portability must be provisioned by a neutral, open bid process.

(3) No telecommunications carrier is entitled to assess any interstate or intrastate access charges based on its participation in completing a call solely to implement permanent local telephone number portability.

(4) Except for authorized collect, calling card, and third-number billed calls billed to retained numbers, a telecommunications carrier may charge directly or indirectly for interim local telephone number portability only if those charges are based on the costs incurred to provide that service and if the service provided preserves all the same functionalities provided to numbers that are not ported, including but not limited to SS-7 based services and E911.

Subpart F - Procedural Requirements

****608 Service Quality Performance Reports**

(a) Each incumbent local exchange carrier shall submit to the Commission service quality performance reports detailing the

service provided to other local exchange carriers. These reports shall include the following information:

- (1) Each service and facility ordered by another local exchange carrier;
- (2) The date on which the service or facility was ordered;
- (3) The date by which the incumbent local exchange carrier committed to provide the ordered service or facility;
- (4) The date on which the incumbent local exchange carrier actually provided the ordered service or facility; and
- (5) The date and content of all communications with other local exchange carriers concerning any service quality complaints or problems experienced with services or facilities provided by the incumbent local exchange carrier.

(b) The service quality performance reports required in subsection (a) must be submitted quarterly through December 31, 1998.

44.609 Emergency Complaint Process

(a) Any local exchange carrier may file an emergency complaint against another local exchange carrier with the Commission with regard to any alleged failure to comply with the Commission's rules that impairs the ability of the Complainant to

provide service to its customers or threatens the quality of those services.

(b) The complaint shall contain the name and address of the Complainant and Respondent and shall contain a verification signed by the Complainant or officer thereof if Complainant is a corporation. The complaint shall be accompanied by a copy of all written agreements between the parties for the provision of local exchange services and facilities. The complaint shall allege with particularity the rates, terms, and conditions of all local exchange services or facilities the provision or lack of provision of which by Respondent is alleged to be in violation of the Commission's rules. Factual allegations shall be supported by affidavit of a person or persons with actual knowledge of the facts and exhibits shall be verified by the person who prepares them. The Complainant shall serve a copy of its Complaint on the Respondent local exchange carrier to ensure receipt no later than the date the Complaint is filed with the Commission.

(c) Respondent shall have 10 business days from the date the complaint was filed within which to file a response. Respondent shall serve its response on Complainant so that the Complainant receives the response no later than the date filed. Complainant shall have 5 business days from the date the response was filed within which to file a reply. No other filings and no motions other than for an extension of time will be considered unless authorized by the Commission. The response should set forth justification for the rates, terms, or conditions alleged

in the complaint to be in violation of the Commission's rules. Factual allegations shall be supported by affidavit of a person or persons with actual knowledge of the facts and exhibits shall be verified by the person who prepares them. The response, reply and other pleadings may be signed by counsel.

(d) The Commission may decide each complaint on the filings and information before it, may require one or more informal meetings with the parties to clarify the issues or to consider settlement of the dispute, or may, in its discretion, order evidentiary procedures upon any issues it finds to have been raised by the pleadings. The Commission shall render a decision on the complaint no later than 60 days after the date on which the complaint was filed.